

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

Dr. Mac Truong aka Dmt MacTruong,

Plaintiffs,

- against -

President Donald J. Trump, and Vice

President JD Vance,

Defendants.


Action Civil No.

1:25CV00224 ADA

Judge:

FILED

FEB 13 2025

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY  **DEPUTY**

PLAINTIFFS' COMPLAINT

**SEEKING JUDGMENT(S) DECLARING DEFENDANTS' EGREGIOUS
ABUSE OF POWER, COMMISSION OF HIGH CRIMES, MISDEMEANORS,
TREASON, AND INSURRECTION TO TAKE OR KEEP EXECUTIVE POWER BY
MISREPRESENTATIONS OF FACT OR VIOLENCE, AND RECOMMENDING
THAT CONGRESS INVESTIGATE, TRY, IMPEACH AND REMOVE
DEFENDANTS FROM THE PRESIDENCY & VICE PRESIDENCY**

PRELIMINARY STATEMENTS

Dmt MacTruong, also known as Dr. Mac Truong, Plaintiff *pro se*, and other individuals in similar situation and standing, affirms and certifies as follows:

1. In a nutshell, the Plaintiffs herein are all fervent patriotic U.S. citizens. Many of us have been formally sworn in to preserve, defend, and protect the U.S. Constitution that has been adopted by "*WE THE PEOPLE*" at the cost of our lives and/or fortunes if required by law, above which nobody is. As such, we believe in all rational good faith that the laws of this free, democratic and republican country, called the United States of America may not be made and/or enforced by a group of legally uneducated, irresponsible, and arrogant politicians, elected or appointed government officials. Plaintiffs also strongly believe that America is a nation of law and that nobody, including God, if this entity does exist, or

egomaniac human beings like President Donald J. Trump, [See, SIDENOTE 1], are above the law.

2. **[SIDENOTE 1:** Plaintiff MacTruong herein voted twice for Defendant Donald J. Trump to become the 45th President of the U.S.A. I helped him twice from being impeached. Once, I wrote to him an email telling him in substance to shut up on the scandalous issue of whether he had used campaign funds to pay Stormy Daniels. He did listen but his lawyer Giuliani did not and continued. I wrote another email to Giuliani telling him to shut up also. He finally did and as we all know, the scandal was forgotten. The second impeachment attempt by Congress was abandoned mainly because of my known winning logical argument that was listened to by all Republicans and many Democrats that it makes no sense as a matter of law to try to impeach, i.e., stop a former President, hence a regular citizen, from continuing to be President, even though we can certainly investigate and/or prosecute him for such criminal misconduct as the Jan. 6 Insurrection. I know I have great influence on Defendant Trump's mind because for years I texted and/or emailed with him, his family, and his group daily several times a day, and I have friends who are part of the media in Congress informing me of the impact of my email messages.

3. The latest undisputed evidence showing Plaintiff's dominant influence on Trump's vision is my idea of not only making America great again but also the entire world one peaceful united planet with all humanity advancing to the next level of civilization, commencing, for instance, with an equal and friendly partnership with Canada as the 51st State, Mexico the 52nd, Denmark and Greenland, the 53rd, United Kingdom the 54th, France the 55th, Panama and Central America, the 56th, and so on, but not rigidly in that order. Only on Sunday 2/2/2025, after having received my December 2024 letters, Defendant Trump revises his arrogant and hostile idea of tariffing Canada to compel it to submit to his MAGA policy. He now adopts instead my suggested friendly invite to Canada to become the 51st State of the USA, a plan that is not vexatious at all but advantageous to both countries in short and long terms, and that would depend on the free will of both nations to peacefully make it a wonderful reality in just a few years to come. [See, **EXHIBIT A** – Attached - for Plaintiff's December 2024 Letters to Pres. Elect Trump and some concerned U.S. Senators,

and interested persons.] [See, also **EXHIBIT B For History of Presidential Impeachment in the USA.**]

4. Plaintiffs herein further believe in Absolute Relativity, the ultimate supreme principle of the changing universe, meaning in simplistic not quite correct language that nothing is absolute, everything is relative. However, for all theoretical and practical purposes, the bottom line or highest spirit of the U.S. Constitution requires that all competent and patriotic U.S. citizens actively participate in the good functioning of our government and have our most sacred rights and duties to defend our people and land by exercising our “citizen prosecution” power that is identical to the concept of “citizen arrest.” Indeed, “citizen prosecution” is legal and should be allowed by competent courts of law so long as the prosecution of the criminals or law violators is carried out in court by legally educated U.S. citizens, knowing the U.S. Constitution and/or federal law relatively better than those official prosecutors, who are incompetent or biased or overworked to perform their formal duties. The true American spirit is, WE THE PEOPLE do our utmost best to accomplish our duties and exercise our rights, then also do our best to help our fellow citizens do theirs. We do not just do our jobs when we are forced to work like slaves, nor shall we only produce expecting a good salary. [See, SIDENOTE 2]

5. **[SIDENOTE 2:** It is undisputed that the Police cannot be everywhere, and a well-meaning citizen can be an asset to protect other citizens from crimes. It is settled law in modern America that “citizen arrest” is legal and welcomed, even though it’s limited and must not be abused. On one hand, there is a good reason for keeping a citizen arrest law on the books. On the other hand, people crossing the line from good Samaritan to TV Cop should be held accountable. Whenever a citizen wants to control another person physically, that citizen must think of the consequences first. Is the action justified, or is it easier to call the police? The first action in any of these circumstances must be to call law enforcement. “Citizen prosecution” is one by legally competent patriotic private citizens assisting public law enforcement by paid professionals, who may be overworked or incompetent to handle literally millions of ultra-diverse and unexpected issues of modern America. There is no risk of abuse by Citizen Prosecution because it is controlled all steps of the way by the Courts.]

6. Plaintiffs herein also have evidence admissible in a court of law that individually and/or collectively, Defendants herein have abused the respective positions they currently occupy in

the executive branch of our government by intentionally making material misrepresentations of fact or legal conclusions, to hold themselves and/or their specific groups as being actually and wrongfully above the law.

7. Plaintiffs herein further believe that not only this Court has the necessary jurisdiction and power but also the constitutional and legal duty to adjudicate the instant complaint in favor of Plaintiffs, i.e. finding and/or declaring and/or recommending to proper authorities such as the U.S. House of Representatives and U.S. Senate, to further investigate Defendants' violation of Plaintiffs' Constitutional Rights to be governed by a truly liberal democratic and republican **government of, by, and for the people.**

8. Plaintiffs herein further believe that the abovementioned constitutional inherent rights include the right and freedom to think, speak, and act, so long as our thoughts, words, and actions are reliable, productive, and respectable. [See, SIDENOTE 3]

9. **[SIDENOTE 3:** The main work ethics or morality of Plaintiffs that is 100% in tune with the spirit of the U.S. Constitution are the same as those of ideal world citizens: RPR in AR. First "R" = Reliability (meaning, keeping one's word, no lie, no fraud, no cheating) - "P" = Productivity (meaning, creating useful products and services) - Second "R" = Respectability (meaning, respecting Life, Property, and Freedom) "in AR" = "in Absolute Relativity" (meaning, in Liberty, Good Faith, Reasonability, Balance, and Creativity)

10. The ultimate general policy or outlook or philosophy for Plaintiffs to live our lives in this world within and/or without ourselves that is 100% in conformance with the spirit of the U.S. Constitution is the same as those of ideal world citizens: Being Strong and Kind. Being STRONG means being capable of causing others to respect our right to RPR in AR. Being KIND means being capable of disciplining ourselves to treat others with RPR in AR.]

11. Plaintiffs herein further believe that the abovementioned constitutional basic natural rights undisputedly include the right and freedom of choice to enjoy sex in all discretion and privacy and/or to selectively reproduce to ensure the survival of humanity. Our most basic constitutional rights undisputedly include the one to absolutely own and control our lives and bodies to pursue happiness. These rights are overtly guaranteed by the U.S. Constitution to all as being reasonably and rightly upheld in 1973 by SCOTUS in *Roe v Wade*.

12. Plaintiffs herein further exercise our constitutional rights under the First and all other appropriate Amendments to respectfully move this noble Court, which has been created by the Constitution and appropriate U.S. federal laws, to grant relief to all or any part of our causes of action in the instant complaint that the Court may determine to be meritorious or necessary to preserve the American Liberty Republic and Democracy.

13. In a nutshell, by this document, written under the penalty of perjury, Plaintiffs herein complain to this noble Court that Defendants herein are members of a radical Christian white supremacist conservative group who are quietly or overtly racist toward black or colored Americans, or more particularly non-American or non-Jewish. Above all they are misogynists. They do love and cherish women passionately, or actually more than allowed by law, in their own way, like sex objects or home keepers, but certainly, they do not trust that women are equal to men or capable of making the "right" decision when facing important issues like abortion.

14. Plaintiffs have undisputed evidence showing that directly or indirectly Defendants herein have acted in concert with one another and under the lead of Defendant convicted felon Donald J. Trump to achieve their alleged MAGA (Make America Great Again) goal, in egregious violation of 18 U.S.C. § 371, which creates an offense in the event *"two or more persons conspire either to commit any offense against the United States or to defraud the United States, or any agency thereof in any manner or for any purpose,"* and/or numerous other applicable provisions of the U.S. Criminal Code.

15. Upon information and belief, MAGA movement tries to restore some of the American pre-Civil War moral values that would subtly or overtly keep black Americans and women in an inferior status. They are trying to re-establish partial slavery, destroy the most basic principles of the U.S. liberty, democracy, republic, balanced division of the three main branches of the government: Legislative, executive, and Judiciary. They try to establish an autocracy, or dictatorship, in the hands of Defendant Donald J. Trump, a legally uneducated businessman, who has a passionate demagogic vision of putting alleged American short-term interest first, while ignoring that the ultimate interest of a true liberal democratic and republican country is not necessarily financial only for one individual or his group. It must be in the long term the legitimate legal moral and philosophical interest of all the country.

16. In this civil action, this Court can and has ultimately its formal sworn-in duty pursuant to Article II, Section One, Clause 8, of the United States Constitution, and the 14th Amendment, and existing federal laws to grant plaintiffs a formal finding declaring defendants' egregious abuse of power, commission of high crimes, misdemeanors, treason, and insurrection to take or keep power by material misrepresentations of fact or violence, so that the U.S. Congress could follow this Court's lead to impeach and remove Defendants herein from the presidency and vice presidency of the U.S.A. [See, EXHIBIT B, For History of U.S. Presidential Impeachment.]

17. This District Court has further the full constitutional and legal rights to re-declare *Roe v. Wade* the law of the land while rejecting outright *Dobbs v. Jackson* ruling as an error having been intentionally committed by 6 radical conservative SCOTUS justices due to their prejudices and biases as members of a radical Judeo-Christian White Supremacist political group better known as MAGA under the leadership of Defendant President Donald J. Trump, who had been a convicted felon and a hardcore liar, by a jury in a valid New York State court of law, prior to his latest November 2024 Presidential election.

18. This action is open for all U.S. citizens to join in, actively participate, and cooperate with Plaintiff *pro se* Dmt MacTruong and all other potential interested Plaintiffs, [See, EXHIBIT A] whether their names are already or later added in the caption. All the requirements are that their original signature(s) be posted at the end of this Complaint and filed with the Court, and the true copies thereof mailed to the Defendants with proof of service.

JURISDICTION AND VENUE

19. This is a civil action by U.S. citizen prosecutor Plaintiff Dmt MacTruong *pro se* and other well-known plaintiffs seeking a leading declaratory judgment so that the U.S. Congress could follow suite to lawfully impeach and remove the two Defendants herein respectively from the presidency and vice presidency of the U.S.A. in accordance with the procedures already designed by the U.S. Constitution and rules of procedure by Congress in the four prior impeachment trials in American history. [See, EXHIBIT B for a summary

analysis of the four impeachment trials of three Presidents of the United States: (1) Andrew Johnson, (2) Bill Clinton, and (3) Donald J. Trump, twice.]

20. This U.S. District Court has subject-matter jurisdiction over this civil action because the U.S. government is a defendant under 28 U.S.C. §1331, and/or criminal conspiracies in violation of 18 U.S.C. § 371, which creates an offense in the event *"two or more persons conspire either to commit any offense against the United States or to defraud the United States, or any agency thereof in any manner or for any purpose."* (Emphasis added). See Project, *Tenth Annual Survey of White Collar Crime*, 32 Am. Crim. L. Rev. 137, 379-406 (1995) (generally discussing § 371).

21. This U.S. District Court has subject-matter jurisdiction over this civil action pursuant to 28 U.S.C. §1331, which grants federal district courts original subject-matter jurisdiction over "all civil actions arising under the Constitution, laws, or treaties of the United States" including but not limited to 17 U.S. Code § 102 and/or 18 U.S.C. § 371, 10 U.S. Code § 921 - Art. 121; or any applicable provision of the U.S. Constitution and/or relevant controlling federal legal authorities such as 18-0241 Conspiracy v. Citizen rights; 28-1331v Violation of 1st, 4th, 5th & 8th Amendments; 28-1343 & 28-1981 & 28-1983 Violation of Civil Rights; 05-552a to Privacy Act; 18-0241 CoConspiracy v. Citizen rights; 28-1331v Violation of 5th & 8th Amendments; 28-1343 & 28-1981 & 28-1983 Violation of Civil Rights.

22. Venue is proper in this Court pursuant to 28 U.S.C. 1391(b) and (c) since all the defendants herein are residing and/or doing business in the U.S. State of New York.

23. Additionally, most of the events, circumstances, and/or actions such as acting in concert to commit any offense against the United States or to defraud the United States, or any agency thereof in any manner or for any purpose.

24. Finally, upon information and belief none of the Defendants herein would object to the venue of this Court, which is not inconvenient for them to attend, seeing that all court filings or appearances will be made by submission of papers and/or virtual hearings to be directed and scheduled by the Court.

THE PARTIES

(a)

THE PLAINTIFFS

25. Dmt MacTruong, also known as Dr. Mac Truong, Plaintiff *pro se*, is over 80 years of age. I am a philosopher with my own original philosophy entitled Absolute Relativity (AR hereafter), meaning absolutely everything, including truth, falsehood, existence, inexistence, life, death, the universe, absolute, relativity, God, heaven, hell, good, evil, Aristotelian principle of non-contradiction, motion of non-null masses, matter, antimatter, is relative. The distinctions of these terms have been made up artificially by human minds. As such, AR is a contradiction in terms, which is however not absolutely but only relatively untrue. "Absolute Relativity" is the title and sole topic of the 414-page thesis written in French for my 1972 Ph.D. degree in Philosophy at the Faculty of Letters and Human Sciences, Paris-Sorbonne-Panthéon University, France, commonly known as the Sorbonne, being located at the Sorbonne Street, Paris 5e.

26. Sorbonne Professor of Philosophy Pierre Aubenque, who sponsored my doctoral thesis admiringly said that Absolute Relativity is the ultimate goal of traditional Philosophy to discover absolute truth on the zodiac from Socrates, Plato, and Aristotle, then to Descartes, Kant, and Hegel. Finally, Mac Truong discovered it by logically exploding Aristotelian principle of non-contradiction, that Aristotle contradictorily called principle of contradiction, as if this one could not exist or make sense, and built it into an indisputable system of thought that no one can argue against to teach all human mind, except the careless uneducated, how to think, speak and act rationally and appropriately to start a new era, the Absolute Relativity Era, based on a new way of reasoning, communicating, and acting together so that the educated part of humanity could progress in freedom and creativity without violence or defrauding or betraying one another.

27. Plaintiff Mac Truong was born on May 1, 1944, in Bắc Ninh near Hanoi, North Việt Nam. In 1953, my parents flew me to Đà Lạt, Center of Việt Nam, to study. In 1954, I flew back to Hà Nội. Then because of the division between North and South Việt Nam at that time, I permanently moved South in 1955 to live with my large family as a young student in Sài Gòn. In 1963, I flew to France to pursue my college education. There, I passionately studied in the fields of my choice. In June 1968, I obtained my bachelor's degree in law from the University of Montpellier in Southern France on the shores of the Mediterranean. In October 1968, I obtained two bachelor's degrees in Philosophy and Psychology from the University of Montpellier. On June 6, 1969, I got a master's

degree in philosophy. October 1969 a master's degree in psychology at the Sorbonne, Paris-Panthéon. On December 12, 1970, I was awarded an LL.M. in Public Law. In July 1971, as hereinabove mentioned, I completed my 414-page Doctor of Philosophy thesis entitled "*La Relativité Absolue*," in the University of Paris-Sorbonne-Panthéon. In June 1973, I obtained the highest and most respected academic diploma in law in France, aka, the Juridical Science Doctorate (J.S.D.) in International Public Law (Docteur d'Etat en Droit) with a 385-page thesis entitled "L'Éthique du Droit International Public" at the Faculty of Law, Paris-Sorbonne-Panthéon University, France.

28. The most respected of his time French International Public Law professor Paul Reuter (1911-1990), who graded my said doctoral thesis entitled "L'Éthique du Droit International Public," commented that he valued the immense diverse culture I had exhibited in my thesis and my inventive genius to put them all together in one united coherent international legal system, which had never existed before, and to be built by humankind's greatest minds to lead all of us to the next level of interplanetary civilization. [See, SIDENOTE 4]

29. **[SIDENOTE 4:** My foregoing 414-page Ph.D. thesis in Philosophy in French at the Sorbonne, and 383-page J.S.D. thesis in International Public Law in French will be emailed to any interested party free of charge by email upon request to Dmt@Dmtmovies.com. Also, the remarkable life of European famous philosophy Professor Pierre Aubenque, and that of world-famous International Public Law professor Paul Reuter (1911-1990) are available online by just typing in their respective names for all to review and be impressed by my correct choice of whom to learn from to get the best world-caliber education available before going free and creative on my own.]

30. In 1980, Plaintiff Dmt MacTruong enrolled in an LL.M. International Public Law program, at the New York University School of Law, Manhattan, New York, before successfully passing the Bar Exam of the State of New York. I was sworn in as an NYS attorney at law on February 17, 1982, in Brooklyn, New York. Thereafter, I practiced law for more than 20 years in Manhattan, New York. I handled successfully more than 20,000 lawsuits of all types and nature at all levels of the court system, both state and federal. I could handle so many lawsuits because I must be among the first lawyers who had learned IBM programming and used word processing to process my cases. In 1993, upon my request, more than 12 U.S. Senators including Patrick Daniel Moynihan, Frank Lautenberg, and Joe R. Biden, Jr., recommended me to then-President Bill Clinton to become an associate justice of the U.S. Supreme Court.

31. Despite Plaintiff's full-time legal practice, I have obtained several major patents of invention and authored many published books in three languages: Vietnamese, French, and English, including the 2000-page GOD ALMIGHTY'S THE GOD FACTOR, available on Amazon since 2017. I am presently planning

to publish my 4000-page book entitled "Superhumankind in Action The Book" to be distinguished from my already published 4-hour full-featured movie "Superhumankind in Action The iMovie" that can be seen by all interested people online by just typing in any Internet browser "DMTMOVIE.COM." Many of those who watched it called and told me that it was the most entertaining, positive, and educational movie ever they had seen. But I guess legally, and philosophically uneducated critics and viewers do not either praise or put my movie down without even watching it. Indeed, by doing otherwise, they will certainly create a so overwhelming intellectual revolutionary firestorm that will put an end worldwide to the historic two-thousand-year Judeo-Christian philosophical, theological, moral, legal, social, and cultural dominance, something many pro-Jewish and radical White Christian Supremacists are surely not prepared to now see become a reality. Obviously, it would be practically impossible for this tremendous very proud, and self-righteous Judeo-Christian audience in current America, who have been brainwashed for more than three millennia by Mosaic God 1.0's teaching, with simplistic and outdated legal principles as "*an eye for an eye*," and two thousand years of Christian God 2.0 propaganda, with simplistic and outdated moral advice as "All is Love," just to see how a reform of such magnitude by a non-Judeo-Christian born thinker, like Dmt God 3.0 Plaintiff herein, could actually not lead to a violent disastrous end of the world by wars and climastrophes, as predicted in Jesus God 2.0's Gospel, but instead to the beginning of a new non-communistic and non-Judeo-Christian era of peace, science, justice, equality, freedom, reason, balance, harmony, happiness, and creativity for all humanity, aka the Absolute Relativity Era.

HOW WAS RETIRED NYS ATTORNEY MAC TRUONG WRONGLY SUSPENDED BETWEEN 2005-2012 BY THE NYSC, THEN FULLY VINDICATED BY THE USCA3 AND USCA2?

In 2005 the New York Supreme Court suspended plaintiff Mac Truong as an attorney at law on the baseless alleged grounds that my wife and I had submitted a forged lease agreement at trial, and that I had been overly aggressive and had a history of filing frivolous lawsuits or disobeying court orders. *[See, Attached or Online.]* This arbitrary determination contrary to evidence on trial record has drastically changed my life and tarnished my otherwise great reputation, and no U.S. Senators support me to sit at SCOTUS anymore. It requires consequently some fair and just public explanation and correction. In 1995, I commenced a civil action in the New York Supreme Court, New York County, against 10 former South-Vietnamese oceangoing shipping companies known as Vishipco Lines and Charles Schwab & Co. for having acted in concert to convert about \$5M in my 5 personal and 3 corporate accounts at Schwab plus \$150M for punitive damages because of their such

egregious criminal misconduct, consisting of arbitrarily taking all assets in my accounts under my name and absolute control for a continuous period of about 20 years without my permission or court order. Due to the defendants' powerful and malicious defense, said original action multiplied into no less than a dozen in several State and Federal Courts at all levels including USCA2, USCA3, and SCOTUS, involving not only the original defendants but also many State and Federal Court judges, whom I sued for obvious judiciary misconduct such as making material misrepresentations of fact to rationalize adverse decisions against me and help my adversaries convert hundreds of millions of dollars from me under color of law.

Those actions lasted from 1995 to 2014, i.e., 10 years prior to my disbarment in 2005 and 9 years thereafter. As seen in the Disbarment Order, *[See, Attached or Online.]* my misconduct warranting my disbarment was nothing but conclusory findings by a NYSC justice alleging in substance that I was of extreme bad faith and would not accept an adverse court finding or order until after I would have exhausted all judiciary remedies in the highest court of the land, such as the New York State Court of Appeals or SCOTUS, and/or filed actions and/or complaints against the presiding or trial judges themselves or referees for making conclusory false findings of fact and/or incorrect controlling legal authorities, and/or improper method of reasoning to allow my adversaries to escape their accountabilities and literally abscond with millions of my hard-earned monies. Patently, such a type of my vigilant litigation reaction to adverse court orders did not please my opponents or judges. As such, my attorney license ended up being revoked. *[See, Attached or Online.]* Interestingly, *MacTruong et al. v. Kevin Stitt et al.* in the USDC-OWD Docket No. 5:22-cv-491-R and/or *MacTruong et al. v. DeWine et al.* in the USDC-SDO Docket No. 2:22-cv-2908 (MHW) were two most recent typical illustrations of how my honest fight for justice can be distorted by my dishonest adversaries and half-legally educated judiciary officers, and I ended up being portrayed as a frivolous and sanctionable litigant. Undisputedly, they lacked proper legal education or a correct sense of justice.

In any event, the following is my undisputed legal evidence that the suspension of my attorney license was unjust and wrong, and I was fully vindicated as a matter of law by higher courts' Orders. Indeed, on May 12, 2005, the USCA3 issued an order declaring that the alleged ground of the 2003 NYSC suspension of my attorney license, to wit, my alleged submission of a forged lease agreement in *Broadwhite v Truongs* was null and void, and enjoining parties and non-parties from referring to my disbarment to libel or defame me and/or my wife or be held in contempt of court. *[See, Injunction Order and Comments, which are voluminous but will be served free of charge by email upon request to Dmt@Dmtmovies.com.]* Also, on June 5, 2007, the incumbent SCOTUS Justice Sonia Sotomayor, then a USCA2 Circuit Judge granted my motion to vacate the prior USCA2's automatic collateral disbarment

order based on the NYSC 2005 original Disbarment order. As a result, even though I was disbarred by the NYSC in 2005, I was not by the USCA2 in 2007 and have never been until retired in 2012. [See, *Vacatur Order and Comments, which are voluminous but will be served free of charge by email upon request to Dmt@Dmtmovies.com.*]

CONCLUSION: My 2005 Suspension by the NYSC was not evidence of any of my dishonorable conduct as an attorney at law or as a person. It was determined by both the USCA2 and USCA3 to be groundless and false as a matter of fact and law. In any event, the 7-year period of suspension of my license on August 11, 2005, expired on August 10, 2012, i.e., more than 12 years ago, with all that this may imply, which for one thing is nobody can refer to it to harm my credibility on anything I may say or do unless they have admissible evidence in support or wish to be held in contempt of court and sanctioned by the USCA3, for defamation or libel.

32. Finally, Plaintiff Dmt MacTruong has been a patriotic U.S. citizen in the last 43 years. I was solemnly sworn in under oath on November 12, 1980, to do anything within my power and the limits of the U.S. Constitution and reasonable laws to protect the full interest of the United States of America with all the people therein. I can assert right herein with pride under the penalty of perjury that I have taken my oath to protect and defend the U.S. Constitution much much more seriously than traitor convicted felon Defendant Donald J. Trump or Defendant Vice President JD Vance.

33. **Plaintiff *pro se* MacTruong** currently resides in the U.S. State of New Jersey and maintains an office at 35 Journal Square, Suite 419, Jersey City, NJ 07306. Phone Number (914) 215-2304.

34. **Upon information and belief, interested Plaintiff *pro se* Adam Schiff is a U.S. Senator from the U.S. State of California**, with an office at Hart Senate Office Building #112, Washington, DC 20510. [See, EXHIBIT A for more information.]

35. **Upon information and belief, interested Plaintiff *pro se* Jack Smith is a former Special Prosecutor**, with an office at Department of Justice, Special Counsel's Office, 950 Pennsylvania Avenue NW, Room B-206, Washington, D.C. 20530. [See, EXHIBIT A for more information.]

36. **Upon information and belief, interested Plaintiff *pro se* Elizabeth Ann Warren, is a U.S. Senator from the U.S. State of Massachusetts**, with an office at 317 Hart Senate Office Building, Washington, DC 20510, Phone: (202) 224-4543

37. **Upon information and belief, interested Plaintiff *pro se* Manhattan District Attorney Alvin L. Bragg Jr., Alvin Leonard Bragg Jr.** is an American politician and lawyer who

serves as the New York County District Attorney, in the Southern District of New York. My mailing address is Alvin Leonard Bragg Jr., One Hogan Place, New York, NY 10013.

38. Upon information and belief, interested Plaintiff *pro se* Cory Booker is a U.S. Senator from the U.S. State of Jew Jersey, with an office at 120 Constitution Ave NE Ste 717, Washington, DC 20002. (202) 224-3224.

39. Upon information and belief, interested Plaintiff *pro se* Alex. Ocasio-Cortez is a U.S. Representative from the U.S. State of New York, with an office at 250 Cannon House Office Building, Washington, DC, 20515-3214. Phone: (202) 225-3965.

40. Upon information and belief, interested Plaintiff *pro se* Bernie Sanders is a U.S. Senator from the U.S. State of Vermont, with an office at 185 Dirksen Senate Office Bldg., Washington, D.C. 20510.

41. Upon information and belief, interested Plaintiff *pro se* Rand Paul is a U.S. Senator from the U.S. State of Kentucky, with an office at 185 Dirksen Senate Office Bldg, Washington, D.C. 20510. [See, EXHIBIT A for more information.]

(b)

THE DEFENDANTS

42. Upon information and belief, Defendant Donald J. Trump is the 47th President of the United States of America, residing at and/or doing business from his office at the White House, 1600 Pennsylvania Ave. NW, Washington, D.C. 20510.

43. Upon information and belief, Defendant JD VANCE is the 50th Vice President of the United States of America, residing at and/or doing business from his Vice President Office at the White House, 1600 Pennsylvania Ave. NW, Washington, D.C. 20510.

AS AND FOR A FIRST CAUSE OF ACTION AGAINST THE DEFENDANTS

Treason by Calculated Infringement of Birthright Citizenship
Granted by the U.S. Constitution and Affirmed by SCOTUS.
Aggravated Abuse of Executive Power by Willful Violation of

Principles of Separation of Powers – Checks and Balances

44. Plaintiffs repeat all the allegations already made hereinabove with the same force and effect as if fully set forth at length herein. Additionally, Plaintiffs' First Cause of Action is based on the following facts, which are both judicial notice and public knowledge, and upon information and belief, they will not be contested or disputed by the Defendants herein.

45. Defendant Donald J. Trump was sworn in as the 47th President of the United States on Monday January 20, 2025, returning to office amid pomp and ceremony at the Capitol Rotunda. Trump was sworn in by Chief Justice John Roberts, shortly after Defendant JD Vance took the oath as vice president.

46. The oath of office of the President of the United States is the oath or affirmation that the President takes upon assuming office. The wording of the oath is specified in Article II, Section One, Clause 8, of the United States Constitution. A new President must take it before exercising or carrying out any official powers or duties. This clause is one of three *oath or affirmation* clauses in the Constitution, but it is the only one that actually specifies the words that must be spoken. Article I, Section 3 requires Senators, when sitting to try impeachments, to be "on Oath or Affirmation." Article VI, Clause 3, similarly requires the persons specified therein to "be bound by oath or affirmation, to support this Constitution." The presidential oath requires much more than that general oath of allegiance and fidelity. This clause requires the new president *before he entered on the Execution of his Office, take the following Oath or Affirmation: "I do solemnly swear (or affirm) that I will faithfully execute the Office of President of the United States, and will to the best of my ability, preserve, protect, and defend the Constitution of the United States without any mental reservation."*

47. Notwithstanding the above, on the same afternoon, Defendant Trump signed more than 200 executive orders. [See, SIDENOTE 5]

48. **[SIDENOTE 5:** Allan Lichtman, a professor of history at American University in Washington D.C., told ABC News: "An executive order is a directive issued by the President that goes into the Federal Register. It has the force of law, but it does not require an act of Congress, (...) "Although it has the force of law, it can be repealed by a subsequent president issuing executive orders of his or her own." It is easier to be challenged in Court than a law passed by Congress.]

49. Among the 200 executive orders, Defendant President Donald J. Trump issued, right after taking the Oath, figures a sweeping executive order that would end birthright citizenship for children of undocumented immigrants and some lawful temporary residents.

50. The backlash from American legal scholars was swift. They say the text violates the longstanding interpretation of the 14th Amendment in United States courts. Presently 22 States of the USA are challenging that executive order through 5 different lawsuits. Expectedly, there will be soon many more.

51. **The Fourteenth Amendment - Section 1 Provides:** All persons born or naturalized in the United States, and subject to the jurisdiction thereof, are citizens of the United States and of the State wherein they reside. No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any State deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws. **Section 2:** Representatives shall be apportioned among the several States according to their respective numbers, counting the whole number of persons in each State, excluding Indians not taxed. But when the right to vote at any election for the choice of electors for President and Vice-President of the United States, Representatives in Congress, the Executive and Judicial officers of a State, or the members of the Legislature thereof, is denied to any of the male inhabitants of such State, being twenty-one years of age, and citizens of the United States, or in any way abridged, except for participation in rebellion, or other crime, the basis of representation therein shall be reduced in the proportion which the number of such male citizens shall bear to the whole number of male citizens twenty-one years of age in such State. **Section 3:** No person shall be a Senator or Representative in Congress, or elector of President and Vice-President, or hold any office, civil or military, under the United States, or under any State, who, having previously taken an oath, as a member of Congress, or as an officer of the United States, or as a member of any State legislature, or as an executive or judicial officer of any State, to support the Constitution of the United States, shall have engaged in insurrection or rebellion against the same, or given aid or comfort to the enemies thereof. But Congress may, by a vote of two-thirds of each House, remove such disability. **Section 4:** The validity of the public debt of the United States, authorized by law, including debts

incurred for payment of pensions and bounties for services in suppressing insurrection or rebellion, shall not be questioned. But neither the United States nor any State shall assume or pay any debt or obligation incurred in aid of insurrection or rebellion against the United States, or any claim for the loss or emancipation of any slave; but all such debts, obligations and claims shall be held illegal and void. **Section 5:** The Congress shall have the power to enforce, by appropriate legislation, the provisions of this article.

52. By issuing the foregoing undisputedly unconstitutional executive order, banning the birthright citizenship of some people he and/or his MAGA group discriminate against, Defendant Trump has bluntly showed his utmost contempt and disregard for the U.S. Constitution, and has as such undisputedly violated it, which he had been sworn in some hours before to *"preserve, protect, and defend to the best of his ability, without any mental reservation."* Since the order he signed had been prepared before he took the oath, it is undisputed that both Defendants Trump and Vance have willfully lied under oath when they affirmed under the penalty of perjury that they would "faithfully execute the Office of President of the United States, or the Office of Vice President, and would, to the best of their ability, preserve, protect, and defend the Constitution of the United States without any mental reservation."

53. Based on the foregoing official public and undisputed facts, and constitutional and federal rules of law, which nobody can hold themselves above, Plaintiff respectfully moves this U.S. Court to seriously honor its pledge under oath of preserving, protecting, and defending the Constitution of the U.S. without any mental reservation, by issuing a declaratory judgment finding that both Defendants Donald J. Trump and JD Vance have committed the felonies of conspiracy, perjury, abuse of power, and treason to the highest degree against the people and Constitution of the United States of America.

54. The business of the U.S.A. is not a personal one for any individual but that of all American citizens having been sworn in under oath to preserve, protect, and defend the Constitution of the U.S. to the best of our ability without any mental reservation.

AS AND FOR A SECOND CAUSE OF ACTION AGAINST THE DEFENDANTS

Treason by Words and Acts Calling for Insurrection to Overthrow
The U.S. Government by Armed Forces and Other Violent Acts.
Evidence Provided by the Jan 6 Committee and by Jack Smith

55. Plaintiff repeats all the allegations already made hereinabove with the same force and effect as if fully set forth at length herein. Additionally, Plaintiffs' Second Cause of Action against Defendants Trump and Vance for their followers' January 6 2021 undisputed violent assaults against the Capitol, the home of the Legislative Power of the liberal democratic and republican government of the U.S.A., are undisputedly evidenced by the following facts, which are both judicial notice and public knowledge, and upon information and belief, they are admitted and not disputed by the Defendants herein.

56. Asked by ABC News Reporters during a press briefing on Tuesday January 21, 2025, about his executive order pardoning more than 1,500 violent Jan. 6 convicted criminals attacking the Capitol upon his call to arms to allegedly save "his" country, including one who admitted to attacking a police officer, Defendant Trump said he had looked into it and reiterated his prior repetitive claims during the presidential electoral campaign that the rioters were unjustly prosecuted. "The cases that we looked at, these were people that actually love our country, so we thought a pardon would be appropriate," President Trump said.

57. Trump then granted more than 1,500 people convicted of crimes stemming from the Jan. 6, 2021, insurrection at the U.S. Capitol, "a full, complete and unconditional pardon" and commuted the sentences of 14 others involved in the riot. Trump called them "hostages." "What they have done to these people is outrageous," Trump said while signing the pardons and commutations in the Oval Office.

58. On September 27, 2022, after handing out the 7+year sentence to a Jan 6 rioter who had beaten up badly a DC police officer, Judge Amy Berman Jackson (USDC-DC) stated in court that "it has to be crystal clear that it is not Patriotism, it is not standing up for America to stand up for one man who knows full well that he lost. What happened on January 6 and

the effort to keep the spirit alive is the utter antithesis of what America stands for. It is the pure embodiment of tyranny and authoritarianism."

59. The foregoing pardons and commutations immediately sparked a backlash from both Democrats, Republicans, and the union representing members of the U.S. Capitol Police.

60. Since the executive order pardoning more than 1,500 convicted felons, many of them were armed, dangerous, and violent, had been prepared for Defendant 47th President Donald J. Trump to sign well prior to his taking the constitutionally mandatory oath to become the Chief Executive of the U.S. Government, it is undisputed that he had calculatedly and knowingly committed the felonies of conspiracy, perjury, egregious abuse of power, and treason in the highest degree against the people and constitution of the United States of America, he has been sworn in to protect and defend without any mental reservation.

61. Based on the foregoing undisputed presidential executive orders, and the literal reading of the 14th Amendment to the U.S. Constitution, and undisputed facts, and relevant federal rules of law, which nobody can hold themselves above, Plaintiffs respectfully move this federal Court to seriously honor its pledge under oath of preserving, protecting, and defending the Constitution of the U.S. without any mental reservation, by issuing a declaratory judgment finding that both Defendants Donald J. Trump and JD Vance have committed the felonies of conspiracy, perjury, abuse of power, and treason to the highest degree against the people and Constitution of the United States of America.

62. The business of the U.S.A. is not a personal one for any individual but that of all American citizens having been sworn in under oath to preserve, protect, and defend the Constitution of the U.S. to the best of our ability without any mental reservation.

AS AND FOR A THIRD CAUSE OF ACTION AGAINST THE DEFENDANTS

Impeachment Based on High Crimes and Misdemeanors.
Donald J. Trump is a 34-Timed Convicted Felon.
Plaintiff Alvin Bragg, Jr. Is a Witness

63. Plaintiffs repeat all the allegations already made hereinabove with the same force and effect as if fully set forth at length herein. Additionally, Plaintiffs' Third Cause of Action to

impeach and remove Defendants Trump and Vance from their respective offices is undisputedly supported by the following facts, which are both judicial notice and public knowledge, and upon information and belief, they are admitted or confessed and not disputed by the Defendants herein.

64. Defendant presidential candidate Donald J. Trump was convicted in May 2024 of 34 counts of falsifying business records. They involved an alleged scheme to hide a hush money payment to porn actor Stormy Daniels in the last weeks of Trump's first campaign in 2016. The payout was made to keep Daniels from publicizing claims she'd had sex with the married Trump years earlier.

65. Viewing the foregoing, **there are great chances that this hardcore liar and convicted felon for falsifying business records would continue to make and/or falsify the U.S. official records. This is really an enormous public danger that this Court should do its best to eliminate to preserve, protect, and defend the national interests of America and its people.**

66. After Defendant Trump had won the November 5 2024 Election, NYSC Justice Merchan halted proceedings and indefinitely postponed the sentencing so that the defense and prosecution could weigh in on the future of the case. Prosecutors acknowledged that there should be some accommodation for his upcoming presidency, but they insisted that the conviction should stand. Trump's defense attorneys strongly opposed it.

67. Notwithstanding, New York State Supreme Court Justice Juan Merchan imposed upon President-elect Donald J. Trump on Friday January 10, 2025, an unconditional discharge for his 34-felony-count conviction in Manhattan, New York. Trump would not face fines, prison, or any other penalties. During the brief hearing, Justice Juan Merchan said the only lawful sentence that does not encroach on the office of the president is that of an unconditional discharge on all counts.

68. As such, as a matter of law, Trump took office on January 20, 2025, as the first former president to be convicted of 34 felonies and the first convicted criminal to be elected to the office.

69. Consequently, as a matter of constitutional law, even though arguably he might not have been barred from running for president as a convicted felon, he now may and should be lawfully impeached by the House then removed by the Senate from his presidential office he had

admittedly cheated and lied under oath, hence punishable under the penalty of perjury, to reach following the procedure fully and unambiguously designed in the 14th Amendment, Section 1 to 5. [See, EXHIBIT B for a summary analysis of the four impeachment trials of three Presidents of the United States: (1) Andrew Johnson, (2) Bill Clinton, and (3) Donald J. Trump - twice.]

70. Based on the foregoing official public and undisputed facts, and constitutional and federal rules of law, which nobody can hold themselves above, Plaintiffs respectfully move this U.S. Court to seriously honor its pledge under oath of preserving, protecting, and defending the Constitution of the U.S.A. without any mental reservation, by issuing a declaratory judgment finding that both Defendants Donald J. Trump and JD Vance have committed the felonies of conspiracy, perjury, abuse of power, and treason to the highest degree against the people and Constitution of the United States of America.

71. **The business of the U.S.A. is not a personal one for any individual but that of all American citizens** having been sworn in under oath to preserve, protect, and defend the Constitution of the U.S. to the best of our ability without any mental reservation.

AS AND FOR A FOURTH CAUSE OF ACTION AGAINST THE DEFENDANTS

Treason by Cheating Election Law –
Trump's Admission that He Lied that
the Nov. 2020 Election Was Rigged
Witness: Plaintiff Jack Smith

72. Plaintiffs repeat all the allegations already made hereinabove with the same force and effect as if fully set forth at length herein. Additionally, Plaintiffs' Fourth Cause of Action to impeach and remove Defendants Trump and Vance from their offices is undisputedly supported by the following facts, which are both judicial notice and public knowledge, and upon information and belief, they are admitted and not disputed by the Defendants herein.

73. *Newsweek* has reached out to Trump's transition team for comment via email. A Report into Donald Trump's role in the events of January 6, 2021, has been released by the Justice Department. Special Counsel Jack Smith has been investigating allegations that Trump criminally tried to overturn the 2020 election results when he lost the presidency to Joe Biden. Trump had been seeking to block the release of Smith's investigative report, with his lawyers

arguing it would illegally interfere with his presidential transition. The DOJ, on the other hand, has been fighting to get the report made public before Trump takes office, with most pundits believing Trump would not allow the release of the report once he's in the White House.

74. In his report, which was submitted to Congress early Tuesday, Former Special Prosecutor Jack Smith wrote that Trump would have been convicted had he not been elected. Smith said his office began its prosecution of Trump because it had enough evidence against him, saying that "[b]ut for Mr. Trump's election and imminent return to the Presidency, the Office assessed that the admissible evidence was sufficient to obtain and sustain a conviction at trial."

75. He added that he believed Trump criminally attempted to subvert the will of the people and overturn the election results. **"As set forth in the original and superseding indictments, when it became clear that Mr. Trump had lost the election and that lawful means of challenging the election results had failed, he resorted to a series of criminal efforts to retain power," the report states.**

76. The report also includes allegations that Trump sought to put "pressure on the Vice President" [Pence] to delay the vote certification on January 6, 2021, and that he supported the organization of a false slate of electors. The President-elect had faced accusations of inciting the January 6 Capitol riots, where his supporters stormed the building following his repeated, unproven claims that the election was "stolen" through voter fraud.

77. But Smith dropped the case after Trump won the election in November in line with a longstanding DOJ policy not to prosecute a sitting president.

78. On Jan. 9, 2025, Smith released his findings in his case against Trump. **[Associated Press]**

79. Defendant Trump has consistently denied any wrongdoing in the election and pleaded not guilty to all federal charges, asserting that the accusations are politically motivated. Following the release of the report, Trump again reiterated his alleged innocence. "Deranged Jack Smith was unable to successfully prosecute the Political Opponent of his 'boss,' Crooked Joe Biden, so he ends up writing yet another 'Report' based on information that the Unselect Committee of Political Hacks and Thugs **ILLEGALLY DESTROYED AND DELETED**, because it showed how totally innocent I was, and how completely guilty Nancy Pelosi, and others, were. Jack is a

lamebrain prosecutor who was unable to get his case tried before the Election, which I won in a landslide. THE VOTERS HAVE SPOKEN!!!!" Defendant Trump wrote in a post on Truth Social.

80. Notwithstanding, **Trump says it was his decision to describe the 2020 election as 'rigged.'** "You know who I listen to? Myself," Trump said during an interview on NBC. Former President Donald Trump speaks during the Pray Vote Stand Summit, on Sept. 15, 2023, in Washington. Reported By **KELLY GARRITY** - 09/17/2023 12:44 PM EDT.

81. Then former President Donald Trump said Sunday that he didn't respect lawyers and members of his campaign (...) When pressed about how he came to the conclusion that the election was rigged, Trump said it was his own decision. "You know who I listen to? Myself. I saw what happened. I watched that election, and I thought the election was over at 10 o'clock in the evening," Trump said. "It was my decision." "I listened to some people. Some people said that."

82. Former Watergate prosecutor Nick Akerman said there is a rock-solid case against Donald Trump in the Georgia criminal probe into the former president's demand that a state official "find" him more votes after the 2020 election. During an interview on MSNBC's "The Katie Phang Show" on Sunday, Akerman said Trump could likely face an indictment as a Fulton County grand jury investigates his attempt to steal the vote in Georgia. In a recorded call from Trump to Georgia Secretary of State Brad Raffensperger ahead of the official 2020 vote certification, Trump told the election official to "find" the 11,780 votes needed to reverse his loss to Joe Biden in the state. Akerman, who served as an assistant special prosecutor during the Watergate scandal that led to the resignation of former President Richard Nixon, said he believed that tape would be enough to lead to a possible conviction. "If you are asking which of the cases right now, which one is going to send Donald Trump to prison, that is the case," he said. "There is a neat three-year felony in Georgia, that Donald Trump has violated. Prosecutors love tape-recorded evidence because you cannot cross-examine it." "What is significant with those tapes is that when you put it in context of all of the evidence that the January 6 committee has uncovered — you put that together, Donald Trump has zero defense in Georgia," he added. "Trump may have violated several federal laws in his call with Raffensperger. Georgia state law also makes it a crime to willfully tamper with "any electors list, voter's certificate, numbered list of voters, ballot box, voting machine, direct recording electronic (DRE) equipment, or tabulating machine" or to solicit another person to commit such a felony, punishable by a sentence of up to three years in prison. "Put in the context about the January 6th committee has found, I think they have gotten a case beyond a reasonable doubt," he said.

83. The House select committee investigating the Jan. 6 attack on the U.S. Capitol has laid out damning evidence from thousands of hours of testimony and tens of thousands of pages of documents

in hearings this month that create a picture of how Trump and his allies spread falsehoods about the 2020 election and tried to overturn the results despite knowing the accusations were untrue. *[This article originally appeared on HuffPost and has been updated.]*

84. As reported by ABC News journalists **KATHERINE FAULDERS, ALEXANDER MALLIN AND PETER CHARALAMBOUS** on **January 14, 2025 at 12:45 AM**, in a final rebuke to the former president he investigated and prosecuted for more than two years, special counsel Jack Smith personally denounced Donald Trump for his "laughable" and baseless attacks on the federal prosecutors who brought two criminal cases against him.

85. The stark criticism of the president-elect was included in a letter, obtained by ABC News, that Smith sent Attorney General Merrick Garland last week accompanying his final report detailing his election interference investigation into the former-and-future president.

86. Smith, in the letter, defended his conduct as fully lawful, free of partisan influence, and vital to the aspirations of the justice system. "While we were not able to bring the cases we charged to trial, I believe the fact that our team stood up for the rule of law matters. I believe the example our team set for others to fight for justice without regard for the personal costs matters. The facts, as we uncovered them in our investigation and as set forth in my Report, matter," Smith wrote.

87. Smith, in his letter to Garland, said that his entire case was guided by the principle that the United States is a "government of laws, and not of men" and that no "man in this country is so high that he is above the law."

88. "As set forth in my Report, after conducting thorough investigations, I found that, with respect to both Mr. Trump's unprecedented efforts to unlawfully retain power after losing the 2020 election and his unlawful retention of classified documents after leaving office, the Principles compelled prosecution. Indeed, Mr. Trump's cases represented ones 'in which the offense [was] the most flagrant, the public harm the greatest, and the proof the most certain,'" Smith wrote.

89. "Throughout my service as Special Counsel, my Office had one north star: to follow the facts and law wherever they led. Nothing more and nothing less," Smith wrote. Smith also reiterated that his decision to bring the Justice Department's cases against Trump was fully his own, denying Trump's allegation that the decision to bring indictments in the case was subject to political influence.

90. Since Smith's appointment, Trump has baselessly alleged that Smith was directed by political actors, attacked Smith's family, and suggested his case was "treasonous." "And to all who know me well, the claim from Mr. Trump that my decisions as a prosecutor were influenced or directed by the Biden administration or other political actors is, in a word, laughable," Smith wrote.

91. Days before Trump is to be inaugurated president and begin his avowed overhaul of the Department of Justice, Smith said he fully stands by his actions and described his conduct as rooted in longstanding mandate of the DOJ that "power, politics, influence, status, wealth, fear, and favor should not impede justice under the law."

92. Based on the foregoing official public and undisputed facts, of both public knowledge, judicial notice, constitutional and federal rules of law, which nobody can hold themselves above, Plaintiffs respectfully move this U.S. Court to seriously honor its pledge under oath of preserving, protecting, and defending the Constitution of the U.S. without any mental reservation, by issuing a declaratory judgment finding that both Defendants Donald J. Trump and JD Vance have committed the felonies of conspiracy, perjury, abuse of power, and treason to the highest degree against the people and Constitution of the United States of America.

93. The business of the U.S.A. is not a personal one for any individual but that of all American citizens having been sworn in under oath to preserve, protect, and defend the Constitution of the U.S. to the best of our ability without any mental reservation.

AS AND FOR A FIFTH CAUSE OF ACTION AGAINST ALL DEFENDANTS

Treason and Illegal Acts by Freezing Funds Granted by
Congress – Willful and Reckless Violation of Constitutional
Principle of Due Process and Non-Retroactivity of the Law
Plaintiff and Witness: U.S. Senator Adam Schiff

94. Plaintiffs repeat all the allegations already made hereinabove with the same force and effect as if fully set forth at length herein. Additionally, Plaintiffs' Fifth Cause of Action to impeach and remove Defendants Trump and Vance from their offices is undisputedly

supported by the following facts, which are both judicial notice and public knowledge, and upon information and belief, they are admitted and not disputed by the Defendants herein.

95. WASHINGTON (AP) — The Trump administration announced Tuesday January 29, 2025, that it is offering buyouts to all federal employees who opt to leave their jobs by next week — an unprecedented move to shrink the U.S. government at breakneck speed. A memo from the Office of Personnel Management, the government's human resources agency, also said it would begin subjecting all federal employees to "enhanced standards of suitability and conduct" and ominously warned of future downsizing. The email sent to millions of employees said those who leave their posts voluntarily will receive about eight months of salary, but they have to choose to do so by February 6, 2025.

96. Immediately, about 5 State Attorneys General have filed civil actions to enjoin the foregoing unconstitutional, illegal, and irresponsible executive order or initiative issued by Trump's administration.

97. A judge overseeing a similar case filed by a group of state attorneys general said at a Wednesday January 30 2025 hearing that he would likely impose an order pausing any funding freeze even though the formal directive was rescinded. The states argue in that case that the freeze infringes the U.S. Congress' exclusive power of the purse and would be devastating to a host of critical programs ranging from public health to education and housing.

98. It is of note that as a matter of law, the prompt rescission by the White House of the funding freeze does not wipe out the unconstitutionality and federal illegality of the order. It is rather an open outright public admission of such illegality and irresponsibility of the executive orders of Donald J. Trump, the only criminal legally uneducated businessman felon becoming a second time President of the USA, with a coward and dangerous revenging determination against the entire land of the free and the brave, with our 250 year old liberal democratic and republican governmental system and institutions, which has lots of imperfection but also their own way to self-correct and improve in a transparent legal and constitutional manner that can bring together the best minds in human history from all over the world to work together to advance all humankind to the next level of civilization by practicing RPR in AR, and having full respect and love for one another. There is no need to lower ourselves to Trump's despicable level of behavior.

99. Based on the foregoing official public and undisputed facts, of both public knowledge, judicial notice, constitutional and federal rules of law, which nobody can hold themselves above, Plaintiffs respectfully move this U.S. Court to seriously honor its own pledge under oath of preserving, protecting, and defending the Constitution of the U.S. without any mental reservation, by issuing a declaratory judgment finding that both Defendants Donald J. Trump and JD Vance have committed the felonies of conspiracy, perjury, abuse of power, and treason to the highest degree against the people and Constitution of the United States of America.

100. The business of the U.S.A. is not a personal one for any individual but that of all American citizens having been sworn in under oath to preserve, protect, and defend the Constitution of the U.S. to the best of our ability without any mental reservation.

CONCLUSION

101. National headlines from ABC News: NEW YORK – Friday 1/31/2025 - The captain of an unauthorized tour boat that capsized in the Hudson River, killing a woman and a 7-year-old child, was sentenced Thursday to 18 months in prison, and ordered to pay \$50,000 for the victims' funeral expenses, prosecutors said. (...) Manhattan-based U.S. Attorney Danielle Sassoon said in a statement that the case shows commercial boat captains “that there will be consequences when they fail to follow the federal regulations and safety protocols that exist to keep passengers safe.”

102. Defendants Trump and Vance herein are known to state during their numerous public appearances that as President and Vice President of the USA, they are CEO's of the USA business, or captains of the USA boat and can act as such toward the people of America to make our country great again. That analogy is not correct. The USA is not a boat, and the people of America are not paid passengers, whose lives are presently in the hands of two incompetent and abusive politicians, one of whom is a 34-time convicted felons for having falsified his business records, before he ran for president, having some gifted business experience to make money not with his, but with other people's money, an obsolete Judeo-Christian faith, with a very loose ethical conviction in sincere honesty, but without a qualified education in science, philosophy, law, morality, common sense, or integrity. The President of the USA is the chief of the executive branch of the government. He/she must limit themselves to a diligent and faithful execution of the laws voted by Congress. The

President should neither overstep the legislative power of Congress, nor the judiciary power of the Courts. If he does with pride and contempt, like defendant Donald J. Trump in this case, he must be impeached.

103. How the United States of America should be managed and governed has been clearly defined by the U.S. Constitution, whose provisions may from time to time need interpretation ultimately by the U.S. Supreme Court, but its undisputed general provisions regarding the fundamental principles of federalism, liberty, democracy, republic, equality, justice, transparency, due process, non-retroactivity, separation of power, checks and balances of three main branches, legislative, executive, and judiciary of the government must not be degraded and frivolously tampered with by a legally uneducated arrogant convicted felon for lying, keeping, and/or falsifying business records, who must have never had time for, or any interest in, learning constitutional law, philosophy, justice, due process and morality.

104. The undisputed facts in support of the Plaintiffs' five causes of action in this Complaint show that Defendants have no in-depth knowledge of the laws. By his words, President Trump wants to change the U.S. system of government to hopefully make our country stronger, more prosperous, respected but not taken advantage of by any other nation in the world. Off hand, it's perfectly desirable and legitimate. However, by his deeds, he should be impeached by Congress for having committed numerous impeachable offenses such as those complained of in the Five Causes of Action above. Not letting ourselves taken advantage of by other people does not imply that we are now going all out to forcefully take advantage of all weaker or helpless nations in the world to make ours the greatest disgusting tyrant this Earth has ever known, with only neo-Nazi Israeli Netanyahu the flattering hypocrite supporter.

105. Defendant President Trump should for the least have known for instance that even if his idea of depriving birthright citizenship to undocumented aliens may have some arguable merit, since it is literally contrary to the 14th Amendment, as the President of the United States of America, he should have first simply persuaded a required majority of members of Congress to make and ratify an amendment to that effect. Since he has not followed the procedural protocol designed in the U.S. Constitution in the matter, President Trump's executive orders cited in Plaintiffs Five Causes of Action herein, are undisputedly willful unconstitutional and constitute five impeachable offenses.

[See, **EXHIBIT B** for a summary analysis of the four impeachment trials of three Presidents of the United States: (1) Andrew Johnson, (2) Bill Clinton, and (3) Twice Donald J. Trump.]

WHEREFORE, Plaintiff Mac Truong and all other Plaintiffs who wish to join in this action by signing the instant complaint at a later date by following the procedural rules designed by the U.S. Constitution and the FRCvP, respectfully move the Court for a Judgment:

- (1) DECLARING that Defendants President Donald J. Trump and Vice President JD Vance have committed aggravated ABUSE OF POWER, HIGH CRIMES, MISDEMEANORS, TREASON, AND INSURRECTION TO TAKE OR KEEP POWER BY MISREPRESENTATIONS OF FACT, LAW, or by VIOLENCE; and
- (2) RECOMMENDING THAT CONGRESS take all necessary steps to IMPEACH AND REMOVE Defendants President Donald J. Trump and Vice President JD Vance respectively FROM THE PRESIDENCY and VICE PRESIDENCY OF THE U.S.A., and
- (3) GRANTING Plaintiffs all other and further appropriate ancillary relief as the Court may deem just fair and appropriate in the premises.

Dated: February 3, 2025




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